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Attorneys for Defendants
IRICO GROUP CORP. AND
IRICO DISPLAY DEVICES CO., LTD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No.: 07-cv-05944 JST

MDL No. 1917

This document relates to:

ALL ACTIONS

**DECLARATION OF GERALDINE W.
YOUNG PURSUANT TO CIVIL LOCAL
RULE 6-3 IN SUPPORT OF IRICO
DEFENDANTS UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE
AND REQUEST FOR ADDITIONAL
PAGES FOR ITS OBJECTIONS TO
SPECIAL MASTER'S REPORT &
RECOMMENDATION ON PLAINTIFFS
MOTIONS FOR TERMINATING
SANCTIONS (ECF NO. 6382)**

YOUNG DECL. ISO IRICO DEFENDANT'S
MOTION FOR EXTENSION OF TIME AND
ADDITIONAL PAGES RE: SPECIAL
MASTER R&R

Master File No. 07-cv-05944-JST
MDL No. 1917

1 I, Geraldine W. Young, declare as follows:

2 1. I am a member of the bar of the State of Texas and admitted to practice before this
3 Court *pro hac vice*. I am an attorney with Norton Rose Fulbright US LLP, which represents
4 Defendants Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico
5 Display,” collectively, “Irico” or the “Irico Defendants”) in this action. I make this Declaration
6 Pursuant to Local Rule 6-3 and in support of Defendant Irico Group Corporation and Irico Display
7 Devices Co., Ltd.’s Unopposed Motion to Extend the Deadline to File Opposition to Special
8 Masters Order Report & Recommendation on Plaintiffs Motion for Terminating Sanctions (ECF
9 No. 6382) (the “Motion”). If called as a witness, I could and would testify to the matters set forth
10 in this declaration of my own personal knowledge.

11 2. On May 14, 2023, Special Master Walker issued his 78-page Report and
12 Recommendation on Plaintiffs’ Motion for Terminating Sanctions (the “Sanctions R&R”), which
13 recommended that the Court grant Plaintiffs’ Motion for Terminating Sanctions Pursuant to Rules
14 37(b) and 37(e). ECF No. 6382.

15 3. The Court’s Order Appointing Special Master for Discovery provides that any party
16 “wishing to file objections to the Special Master's orders, reports and/or recommendations must file
17 such objection with the Court within fourteen (14) days from the day the Special Master's order,
18 report and/or recommendation is filed,” ECF. No 2272 at ¶ 6(b), or May 28, 2024, which is the day
19 after the Memorial Day holiday weekend.¹

20 4. The Irico Defendants believe that that good cause exists to provide additional time
21 and pages to brief their objections to the Sanctions R&R given, among other reasons, the severity,
22 complexity, and length of the 78 page Sanctions R&R, the severe and dispositive relief
23 recommended against the Irico Defendants if the Sanctions R&R is endorsed by the Court and the
24 lengthy, complex procedural history that must be addressed relevant to the Sanctions R&R.

25 5. I conferred with counsel for Plaintiffs via conference call on May 17 regarding the
26 Sanctions R&R and the Irico Defendants requested extension of time to file their objections to the

27 ¹ Irico’s lead counsel will be returning that day from a funeral on the East Coast.

1 Sanctions R&R, as well as a request for 35 pages for their objection brief, and counsel for Plaintiffs
2 stated they do not oppose the requested relief.

3 I declare under penalty of perjury that the foregoing is true and correct. Executed this 17th
4 day of May, 2024 in Houston, Texas.

5 Dated: May 17, 2024

/s/ Geraldine Young

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Declaration of Geraldine W. Young** was filed via CM/ECF on May 17, 2024, and as a result has been served on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

By: Jeffrey Margulies

Jeffrey Margulies